

DOLLY M. TROMPETER, ESQ.
CA Bar ID No. 235784
Peña & Bromberg, PLC
2440 Tulare St., Suite 320
Fresno, CA 93721
Telephone: 415-271-8604
Fax: 866-282-6709
dolly@dollydisabilitylaw.com
Attorney for Plaintiff

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

LOR PAO VUE,
Plaintiff,
vs.
KILOLO KIJAKAZI, Acting
Commissioner of Social Security,
Defendant.

} Case No. 1:22-cv-00110-ADA-BAM

} STIPULATION AND PROPOSED
ORDER FOR EXTENSION OF
TIME

}

IT IS HEREBY STIPULATED, by and between the parties through their respective counsel of record, with the Court's approval, that Plaintiff shall have a 3-day extension of time, from September 13, 2022 to September 16, 2022, for Plaintiff to serve on defendant with Plaintiff's Motion for Summary Judgment. All other dates in the Court's Scheduling Order shall be extended accordingly.

This is Plaintiff's third request for an extension of time. Counsel for the Plaintiff returned this weekend from Texas after being out several weeks attending to an emergency with her ill father. (see attached declaration). As Counsel has just

1 recently returned, additional time will be needed to ensure the timely filing of
2 many merit briefs that are already on multiple extensions.

3 Counsel requires additional time to brief the issues on this matter
4 thoroughly for the Court's consideration. Plaintiff makes this request in good faith
5 with no intention to further delay this matter. Defendant does not oppose the
6 requested extension. Counsel apologizes to the Defendant and Court for any
7 inconvenience this may cause.

Respectfully submitted,

10 Dated: September 12, 2022 PENA & BROMBERG, ATTORNEYS AT LAW

By: s/ Dolly M. Trompeter
DOLLY M. TROMPETER
Attorneys for Plaintiff

Dated: September 12, 2022 PHILLIP A. TALBERT
United States Attorney
PETER K. THOMPSON
Acting Regional Chief Counsel, Region IX
Social Security Administration

By: *s/ Ellinor R. Coder
Ellinor R. Coder
Special Assistant United States Attorney
Attorneys for Defendant
(*As authorized by email on September 12, 2022)

ORDER

Pursuant to the parties' stipulation, and cause appearing, Plaintiff's request for a brief extension of time to file a Motion for Summary Judgment is GRANTED. Plaintiff shall file a Motion for Summary Judgment on or before September 16, 2022. All other deadlines in the Court's Scheduling Order are modified accordingly.

IT IS SO ORDERED.

Dated: September 13, 2022

/s/ Barbara A. McAuliffe

UNITED STATES MAGISTRATE JUDGE